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# MEMO ENDORSED

January 9, 2024

Via ECF

Hon. Barbara C. Moses, United States Magistrate Judge  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse

Re: *Kaloshi et al v. West Village Oasis, Inc. et al.*, 22 CV 4593 (AS) (BCM)

Your Honor:

This firm represents the plaintiffs in the above-referenced action. The plaintiffs hereby move, with the defendants' consent, to extend by thirty days all pending discovery and motion deadlines in this action, pursuant to rules 6(b)(1)(A) and 16(b)(4) of the Federal Rules of Procedure.

Yesterday, negotiations resulted in a settlement in principle between the parties, and the parties now intend to reduce the agreement to a writing and, after, move to dismiss the action, pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, upon a judicial finding that the settlement of the Fair Labor Standards Act claims justifies release of the defendants by the plaintiffs.

However, adherence to the pending discovery deadlines while the settlement is finalized would be a hardship to the parties and threaten the viability of the agreement by increasing attorney's fees and costs to both sides. The parties urge that this circumstance constitutes good cause for the extension of these deadlines.


I thank the Court for its time and consideration.

Respectfully submitted,

/s/

Brandon Sherr

Application GRANTED. The parties are reminded that there is a further settlement conference scheduled for January 25, 2024, with confidential settlement letters due no later than January 22, 2024. (*See* Dkt. 86.) If, by that date, the parties have not finalized their settlement, they shall file a status letter explaining the delay. SO ORDERED.



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Barbara Moses  
United States Magistrate Judge  
January 10, 2024